



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/25/03

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR☒ S Q GENERATORCompany name American Meter I.D. Number PADO50942291Site Address 920 Payne AveCounty Erie Municipality Erie Zip 16512Name of Inspector Rich SheriffName & Title of Responsible Official Gaylord Magoon Environmental ManagerPerson Interviewed same Telephone (814) 451-8221

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: < 2200 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____Present were Gaylord Magoon for the facility and Rob Bechtel for the Department.Company has experienced a drop in production and subsequent generation of waste. Re-notification as a SQG had recently been filed.FO03, FO05 Haz Waste Solids and DO01 Waste Paint related material are shipped through HazMat Environmental PA-AH 0315 to Ensco of El Dorado, AR. One shipment had been made in 2003.DO01, DO39 Waste Parts Cleaner is shipped through Safety-Kleen PA-AH0172 to Safety-Kleen of Erie, PA. One shipment had been made in 2003.Company manifests and other hazardous waste records were reviewed. No violations were noted.

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Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed mailed

Date _____

Inspector

Rich A. Sheriff
(Signature)

Date 3/28/03



Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling and Waste Management

Inspection Date 1 / 4 / 00Time Start 10:30Time Finished 12:15

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company Name American Meter Company I.D. Number PAD050942291Site Address 920 Payne AvenueErie, PA 16512County Erie Municipality City of ErieName of Inspector John CrowName and Title Responsible Mr. Gaylord Magoon Environmental / Safety Specialist
OfficialPerson Interviewed Mr. Gaylord Magoon Telephone 814-451-8221Mailing Address (if different from above) P.O. Box 1251, Erie, PA 16512-1251Amount of Hazardous Waste Generated per month: ~1,535 Pounds ~697 Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
 PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
 Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

3. Hazardous Waste Transporters:

Transporter Name	<u>Dart Trucking Company</u>	License Number	<u>PA-AH0219</u>
Transporter Name	<u>Safety-Kleen Systems, Inc.</u>	License Number	<u>PA-AH0172</u>
Transporter Name	_____	License Number	_____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
F003, D001, F005	Paint related material, xylene, toluene	Ensco, Inc.
		American Oil Road
		El Dorado, AR 71730
D001, D039	Petroleum naptha – spent parts washer	Safety-Kleen Systems, Inc.
	Solution	1606 Pittsburgh Ave., Erie, PA

Site Name	American Meter Company	ID Number	PAD050942291	Date	1 / 4 / 01
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4-Non-Compliance

Page 2 of 4

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name American Meter Company ID Number PAD050942291 Date 1 / 4 / 01

1-No Violation Observed

2-Not Applicable

3-Not Determined

4-Non-Compliance

Status				REQUIREMENT	PA CIT 25 PA Code	FED CIT. 40 CFR	LINE ITEM
1	2	3	4	CONTAINERS (Subchapter 1)			
✓				Containers managed in compliance with 40 CFR Part 265 Subpart 1 and 25 Pa. Code Chapter 265a Subchapter 1	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
				Containers and stored waste compatible	265a.1	265.172	H027
✓				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
✓				Containers managed to prevent leaks	265a.1	265.173(b)	H029
✓				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment.	265a.173		H030
✓				Container storage areas inspected at least weekly	265a.1	265.174	H031
✓				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
✓				Proper containment and collection systems in place	265a.179		H033
✓				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
✓				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
✓				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
✓				Containers labeled accurately identify contents	SWMA 6018.403 (b)(2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1 / 4 / 00 Identification Number PAD050942291Company/Facility/Site Name American Meter Company

1. A routine hazardous waste generator inspection was conducted at American Meter Company's Erie facility with Mr. Gaylord Magoon (Environmental / Safety Specialist) and Mr. Brian Mummert (DEP Residual Waste Coordinator). American Meter Company manufactures gas metering and controlling devices.

2. The majority of hazardous (RCRA regulated) waste is generated during the painting of products. A review of American Meter's hazardous waste manifests for the past twelve months revealed that the facility has been consistently generating about 700kg of RCRA waste per month. Based on discussions with company officials, it is currently anticipated that in the near future most products will be powder coated at another facility and the majority of painting operations will be eliminated. Because the facility has been generating less than the small quantity generator limit (SQG) of 1,000kg of waste per month for the past year and the change to powder coatings should further reduce the amount of waste generated, American Meter may wish to submit a revised hazardous waste activity notification form (US EPA Form 8700-12) to change the generator status of the facility from large quantity generator (LQG) to small quantity generator (SQG). Please be advised that a copy of the EPA Form 8700-12 may be obtained at <http://www.epa.gov/epaoswer/hazwaste/data/form8700/forms.htm>.

3. Two drums of RCRA waste were located within the waste accumulation area. Both containers were properly labeled, dated and sealed. An examination of the accumulation area revealed that the containment structure appeared to be in good condition. Three drums, located throughout the facility, are used to accumulate waste at the point of generation. All three of the drums were sealed and clearly labeled with a hazardous waste sticker.

4. Information concerning the Department's Pollution Prevention/Energy Efficiency Site Assessment Grant Program and the Department's P2E2 Site Visit Program was provided and reviewed during the inspection.

Please contact me at 814-332-6829 if there are questions concerning this report or any waste related issue.

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Person Interviewed (Signature) Mailed

Date _____

Inspector (Signature) [Signature]Date 1 / 5 / 01



**Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling and Waste Management**

Inspection Date 11 / 16 / 99Time Start 09:50Time Finished 12:00**HAZARDOUS WASTE INSPECTION REPORT**
☒ **GENERATOR**
☐ **S Q GENERATOR**
Company Name American Meter Company I.D. Number PAD050942291Site Address 920 Payne Ave.Erie, PA 16512 Zip 16512County Erie Municipality City of ErieName of Inspector John CrowName and Title Responsible Mr. Gaylord Magoon Environmental Specialist
OfficialPerson Interviewed Mr. Gaylord Magoon Telephone (814) 451-8200

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per month: ~1300 Pounds ~590 Kgs**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name	<u>Safety-Kleen Systems, Inc.</u>	License Number	<u>PA-AH0172</u>
Transporter Name	<u>Dart Trucking Company, Inc.</u>	License Number	<u>PA-AH0219</u>
Transporter Name	<u>Environmental Service Group</u>	License Number	<u>PA-AH8144</u>

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, D039	Petroleum Naptha	Safety-Kleen Systems, Inc.
		1606 Pgh. Ave. Erie, PA
F003, F005, D001	Paint related materials (Xylene, Toluene)	Ensco Inc.
		Amer. Rd. El Dorado, AR 71730
D001	Adhesives containing flammable liquids	Chemical Conservation of Georgia
		1612 James P. Rogers Circle
		Valdosta, GA 31601

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11 / 16 / 99 Identification Number PAD050942291Company/Facility/Site Name American Meter Company

1. American Meter manufactures gas metering and controlling equipment. The facility is currently classified as a large quantity generator (LQG) of hazardous (RCRA) waste. The inspection was conducted with Mr. Gaylord Magoon (Environmental Specialist) and Mr. John Guth (DEP Solid Waste Manager).
2. Three satellite accumulation areas are currently maintained throughout the plant. Off-spec lead (Pb) containing components are accumulated in one area. According to company officials, the noted lead containing off-spec components do not leach greater than 5.0 ppm Pb when tested using the TCLP method. As discussed on site, American Meter may wish to re-examine the regulatory classification for this waste. If it is determined that the material does not exhibit any characteristic of a hazardous waste, American Meter should obtain approval to dispose of the off-spec components as a residual waste.
3. Six 55-gallon drums of RCRA waste were located in the designated storage area. All of the containers were properly labeled, sealed and marked with an accumulation date. The storage area's spill containment structure appeared to be in good condition.
4. A review of company records revealed that the required employee personnel training was conducted on March 3, 1999 and the company has developed written source reduction strategies (Form 25Rs) for each type of waste generated on site. The facility's environmental emergency response plan was updated in December of 1997, no additions or changes appear to be needed at this time. The biennial report, required by Section 262.41, was submitted to the US EPA on February 17, 1998.

If there are any questions concerning this report or any waste related issue, please contact me at (814) 332-6829.

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Person Interviewed (Signature) Mailed

Date _____

Inspector (Signature) [Signature]Date 11 / 19 / 99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 6/27/97 Time start 11:00 Time finish 12:45
Name of Inspector John Crow
Company, installation name American Meter Company
Location 920 Payne Ave. Erie, PA 16512
County Erie Municipality Erie
Identification number PADOS0942291
Name of responsible official Mr. Gaylord Magoon
Title Environmental Specialist
Mailing Address 920 Payne Ave. Erie, PA 16512
Area code and telephone number (814) 451-8200
Name of person interviewed Mr. Gaylord Magoon
Title Environmental Specialist
Mailing address (if different from above) above
Area code and telephone number above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~ 1,000 kg./mo. Based on 1995-1997 manifests.
b. ~ 12,010 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F003, F005	EnSCO Inc. American Oil	Rd. EL Dorado, AR 71730
D002	Chem Met Services Inc. 18550	Allen Rd Wyandotte, MI 48192
D002	Environmental Enterprises Inc.	4650 Spring Grove Ave. Cincinnati, OH 45232
F003	Chemical Conservation of Georgia	1612 James P. Rodgers Circle Valdosta, GA 31601
D001, D039	Safety-Kleen Corp. 1606	Pittsburgh Ave. Erie, PA 16505

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name American Meter Company ID Number PADO50942291 Date 6/27/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>				Hazardous waste determination, performed on all waste streams	262.11	H001
<input checked="" type="checkbox"/>				Identification number	262.12	H002
<input checked="" type="checkbox"/>				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
<input checked="" type="checkbox"/>				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
<input checked="" type="checkbox"/>				PA manifest used for intrastate shipments	262.20(b)	H005
<input checked="" type="checkbox"/>				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
<input checked="" type="checkbox"/>				Manifests filled out properly and completely	262.20(g)	H007
<input checked="" type="checkbox"/>				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
<input checked="" type="checkbox"/>				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
<input checked="" type="checkbox"/>				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
<input checked="" type="checkbox"/>				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
<input checked="" type="checkbox"/>				Placards offered to transporter	262.33	H012
<input checked="" type="checkbox"/>				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
<input checked="" type="checkbox"/>				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
<input checked="" type="checkbox"/>				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
<input checked="" type="checkbox"/>				a). All containers of haz. waste in good condition	265.171	H016
<input checked="" type="checkbox"/>				b). Containers compatible with hazardous waste being stored within	265.172	H017
<input checked="" type="checkbox"/>				c). Containers of hazardous waste kept closed	265.173(a)	H018
<input checked="" type="checkbox"/>				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
<input checked="" type="checkbox"/>				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
<input checked="" type="checkbox"/>				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
<input checked="" type="checkbox"/>				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
<input checked="" type="checkbox"/>				h). Proper containment and collection system(s)	265.178	H023
<input checked="" type="checkbox"/>				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
<input checked="" type="checkbox"/>				On the job or classroom personnel training program as per 265.16 <i>See comment #4</i>	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
✓				Records retained at designated location for 3 years	262.40(a)	H026
✓				reports submitted to the Department	262.41(a)	H027
✓				Exception reporting procedures followed	262.42	H028
	✓			Hazardous waste disposal plan, if required	262.45	H029
✓				Spill reporting procedures followed	262.46(a)	H030
✓				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 <i>See Comment # 7</i>	262.46(e)	H031
	✓			Special requirements followed for international shipments	262.50,.53, .55, .60	H032
✓				Source reduction strategy prepared and available	262.80	H033

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
✓	✓				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
✓	✓				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
✓	✓				Dilution not used as a substitute for treatment.	3	
✓	✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
					Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
					Containers marked to identify contents and accumulation date.	50(a)(2)	
					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
					Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, Including PBR and RRR Facilities		
					Dilution not used as a substitute for treatment.	3	
					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
					Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
					Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
					Facility retains copies of generator notifications and certifications.	7(c)(1)	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 6 / 27 / 97 Identification Number PAD050942291Company/Facility Name American Meter Company


1. The inspection was conducted with Mr. Gaylord Magoon, Environmental Specialist. This inspection was conducted to determine if the violations observed during the 5/9/97 inspection had been corrected.
2. At the time of the inspection there was one drum of waste located within the RCRA waste storage area. The drum of D001 paint waste was sealed, properly labeled with a hazardous waste sticker and marked with an accumulation date.
3. The cleanup residue generated from the 5/2/97 Sodium Hydroxide waste mixing incident and the twenty (20) drums of previously unidentified materials, were transported off site for disposal on June 20, 1997. The majority of the previously unidentified materials (noted in comment #2 of the Department's 5/9/97 report) were determined to be RCRA regulated wastes and were manifested off site to permitted TSDs.
One additional drum with unidentified contents was recently discovered on site. The drum's contents have been sampled and the container was moved to the empty drum storage area. As discussed during the inspection, it is suggested that the drum be handled as a RCRA waste until a complete hazardous waste determination has been conducted. At a minimum, the container should be stored in an area with a spill containment structure.
4. In response to the 5/2/97 incident, American Meter recently conducted employee training. Additional "Hazcom" training for all employees is scheduled for July 1st and 2nd. First Responder (HAZMAT) Operations Level training is to be provided to the four (4) Maintenance personnel, Maintenance Supervisor and the Emergency Coordinator during the weeks of July 8 and July 14, 1997.

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Person interviewed (signature) _____ Mailed _____ Date _____

Inspector (signature)  Date 6 / 30 / 97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 6 / 27 / 97 Identification Number PAD050942291Company/Facility Name American Meter Company

4. (cont.) As discussed during the inspection, all training related to the management of hazardous waste must be documented. At a minimum, the following records should be maintained on file at the facility and furnished to the Department upon request:

1. The job title for each position at the facility related to hazardous waste management, and the name of the employee holding each position.
2. A written job description for each position.
3. The date and written description of the training received.

Please review section 265.16 (personnel training) of the Hazardous Waste Regulations carefully. Additional unannounced Department inspections may be conducted to monitor compliance with the personnel training requirements.

5. American Meter has taken corrective actions to improve the way drummed materials are managed on site. A Standard Operating Procedure For Drum And Waste Handling has been developed (a copy was submitted to the Department on 6/13/97). A Department review of the SOP revealed that only one individual is currently authorized to issue Hazardous Waste Labels for drums used to store hazardous waste (paragraph #7). The unavailability of the single individual may result in unlabeled drums being utilized to store RCRA wastes. American Meter should consider revising the SOP to ensure that hazardous waste stickers are available whenever needed.

6. There appeared to be a general improvement in the management of non-hazardous wastes. The ten 5 gallon cans of "non-fluid oil" noted in comment #3 of the 5/9/97 report, have been identified as useable products and have been utilized on site. The open drum of oil soaked booms, also noted in comment #3 of the previous report, has been disposed of as non-hazardous waste. A locked, fenced area has also been constructed for the storage of all empty drums.

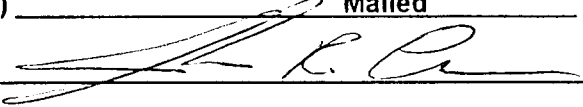
7. It is currently anticipated that the facility's revised Preparedness, Prevention and Contingency (PPC) plan will be completed by August 1, 1997. Please ensure that a copy of the updated PPC plan is submitted to this office.

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Person interviewed (signature) _____ Mailed _____ Date _____

Inspector (signature)  Date 6 / 30 / 97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 5/9/97 Time start 9:30 Time finish 11:00
Name of Inspector John Crow
Company, installation name American Meter Company
Location 920 Payne Ave. Erie PA 16512
County Erie Municipality Erie
Identification number PAD050942291
Name of responsible official Mr. Gaylord Magoon
Title Environmental Specialist
Mailing Address 920 Payne Ave. Erie, PA 16512
Area code and telephone number (814) 451-8200
Name of person interviewed Mr. Gaylord Magoon
Title Environmental Specialist
Mailing address (if different from above) Same as above
Area code and telephone number "

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~ 1,000 kg./mo. Based on 1995 and 1996 manifests.
b. ~ 12,010 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F003	Enso Inc.	American Oil Rd.
F005		EL Dorado, AR 71730
D001	Safety-Kleen Corp.	1606 Pittsburgh Ave.
D039		Erie, PA 16505

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B**

Site Name American Meter Co. ID Number PAD050942291 Date 5/9/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
				Hazardous waste determination, performed on all waste streams	262.11	H001
✓				Identification number	262.12	H002
✓				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
✓				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
✓				PA manifest used for intrastate shipments	262.20(b)	H005
✓				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
✓				Manifests filled out properly and completely	262.20(g)	H007
✓				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
✓				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
✓				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
✓				Placards offered to transporter	262.33	H012
✓				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		✓		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
			✗	Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
✓				a). All containers of haz. waste in good condition	265.171	H016
✓				b). Containers compatible with hazardous waste being stored within	265.172	H017
✓				c). Containers of hazardous waste kept closed	265.173(a)	H018
✓				d). Containers of hazardous waste are managed to prevent leaks <small>See Comment #2</small>	265.173(b)	H019
			✗	e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		✓		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
✓				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
		✓		h). Proper containment and collection system(s)	265.178	H023
		✓		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
			✗	On the job or classroom personnel training program as per 265.16 <small>See Comment #2</small>	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
✓				Records retained at designated location for years	262.40(a)	H026
✓				reports submitted to the Department	262.41(a)	H027
✓				Exception reporting procedures followed	262.42	H028
✓				Hazardous waste disposal plan, if required	262.45	H029
✓				Spill reporting procedures followed	262.46(a)	H030
		✓		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 <i>See Comment # 5</i>	262.46(e)	H031
✓				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
✓				Source reduction strategy prepared and available	262.80	H033

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
✓					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
✓					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
✓					Dilution not used as a substitute for treatment.	3	
✓					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
					Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
					Containers marked to identify contents and accumulation date.	50(a)(2)	
					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
					Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, Including PBR and RRR Facilities		
					Dilution not used as a substitute for treatment.	3	
					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
					Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
					Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
					Facility retains copies of generator notifications and certifications.	7(c)(1)	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 5 / 9 / 97 Identification Number PAD050942291Company/Facility Name American Meter Company

1. The inspection was conducted with Mr. Gaylord Magoon (Environmental Specialist), and Mr. John Guth (DEP Solid Waste Supervisor). This inspection was conducted to determine the cause of the 5/2/97 waste mixing incident that resulted in several employees requiring medical treatment.

2. According to company workers and officials, on 5/2/97 an employee poured Sodium Hydroxide (NaOH), stored in an unmarked drum, into the waste oil collection sump. The concentrated Sodium Hydroxide reacted with Aluminum scrap (shavings/chips) and waste oil in the pit. The chemical reaction in the pit generated a noxious gas which entered the building through open doors, windows and the ventilation system.

Though once used in the metal preparation system, NaOH is no longer utilized in the plant's production process. The remaining stock of NaOH and Toluene (another formerly used material) was to have been consolidated and disposed of. Because the NaOH drum was not properly marked as to its contents, the employee deposited the material into the waste oil sump.

At the time of the inspection, there were twenty (20) drums located in the facility's yard near the waste oil tank. The contents of the drums were recently sampled to confirm the nature of all the materials. It is currently suspected that four (4) drums contain waste paint thinner (80% Toluene) and at least six contain caustic soda. The majority of the drums were not clearly marked as to their contents.

It should be noted that the primary causes of the 5/2/97 incident, unlabeled drums and inadequate employee training, are problems that were noted in this Department's 1/8/97 inspection report (see comments 4,5&6).

To ensure regulatory compliance, the Department strongly suggests that American Meter Company develop and implement a comprehensive employee training program and drum/ waste handling standard operating procedure. Please review sections 265.16 and 262.34 of the Hazardous Waste Regulations and take the appropriate corrective actions. Special care should be taken to ensure that in the future all drums are clearly labeled when waste is first placed in the container. A letter describing what specific actions the facility has or will take to ensure future compliance, should be submitted to this office by June 13, 1997.

This inspection is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left the person.

Person interviewed (signature) _____ Mailed _____ Date _____

Inspector (signature)  _____ Date 5 / 17 / 97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 5 / 9 / 97 Identification Number PAD050942291Company/Facility Name American Meter Company

3. In addition to the previously noted RCRA deficiencies, American Meter appears to need improvement in the way other wastes are managed on site.

At the time of the inspection, a pool of unidentified green liquid was observed under several inverted drums located adjacent to the scrap metal / waste oil storage shed. As discussed during the inspection, Please attempt to collect and properly dispose of the noted waste. American Meter should consider draining empty containers in an area where the residue can be easily contained and collected.

Ten 5 gallon containers of waste "non-fluid oil", and other small containers of waste were observed stored within the scrap metal storage shed. The materials appeared to have been stored on site for an extended period of time. Please be advised that waste should not be stored onsite over one year. In addition to the small containers of waste in the storage area, an excessive volume of leaves, litter and loose metal shavings were present in the area next to the waste oil collection sump. It is suggested that the waste oil collection sump area be periodically cleaned.

An open, half full drum of oil contaminated absorbent booms (pigs) was located just outside the RCRA waste storage shed. The drum was stored on an angle, so that it appeared to be in imminent danger of falling over. As discussed during the inspection, all oil contaminated wastes should be stored in a closed container or under a roof.

4. At the time of the inspection there were sixteen (16) drums located in the RCRA waste storage shed. All the drums were properly labeled, dated and sealed.

5. As noted in comment #3 on the 1/8/97 report, the facility's Preparedness, Prevention and Contingency (PPC) plan on file with the Department is dated 4/22/88. An updated plan should be developed and submitted to this office as soon as possible.

If there are any questions concerning this report or any waste related issue, please contact me at (814) 332-6829.

This inspection is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left the person.

Person interviewed (signature) _____ Mailed _____ Date _____

Inspector (signature)  Date 5 / 17 / 97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 1/23/97 Time start 10:30 Time finish 11:20
Name of Inspector JOHN CROW
Company, installation name American Meter Company
Location 920 Payne Ave Erie, PA 16512
County Erie Municipality Erie
Identification number PADO50942291
Name of responsible official Mr. Gaylord Magoon
Title Environmental Specialist
Mailing Address 920 Payne Ave Erie, PA 16512
Area code and telephone number (814) 456-7553
Name of person interviewed Mr. Gaylord Magoon
Title Environmental Specialist
Mailing address (if different from above) above
Area code and telephone number " "

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~1,000 kg./mo. Based on 1995 and 1996 manifests.
b. ~12,010 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F003	Ensco Inc.	American Oil Rd
F005		El Dorado, AR 71730
D001	Safety-Kleen Corp.	1606 Pittsburgh Ave.
D039		Erie, PA 16505

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

EVALUATION - VIOLATION - ENFORCEMENT FORM

04/95 VERSION

Handler ID Number		Contact Name	RESERVED FOR EPA USE
PAD050942291		Mr. Gaylord Magmon	
Handler Name		American Meter Co.	
Street	City		
920 Payne Ave		Erie, PA 16512	

UNIVERSE CHANGE REQUIRED YES ☒ NO ☐

I. Indicate the facility's current universe(s):

LQG

II. Indicate the new RCRIS Generator Universe (mark only one):

LQG ☐ CEG ☐ NON-HANDLER ☐
SQG ☐ CLOSED ☐

NOTE: All TSD activity changes must be handled by the state data coordinator and cannot be made using this form

III. Indicate the new transporter status (Mark here only if the facility requires a transporter status change):

Transporter ☐

If the transporter box is checked, you must check at least one of the boxes below:

Mark Mode of Transportation
☐ Air ☐ Water
☐ Rail ☐ Other
☐ Highway

Non-Transporter ☐

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete	Date	Number	Agency	Type	Reason	Branch	Person
				012397						

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GGR <input type="checkbox"/>	GSC <input checked="" type="checkbox"/>	TWD <input type="checkbox"/>	DGW <input type="checkbox"/>	DOR <input type="checkbox"/>	DWP <input type="checkbox"/>	BRR <input type="checkbox"/>	FEA <input type="checkbox"/>
GLB <input checked="" type="checkbox"/>	GSQ <input checked="" type="checkbox"/>	DCH <input type="checkbox"/>	DLB <input type="checkbox"/>	DPB <input type="checkbox"/>	DIN <input type="checkbox"/>	BPS <input type="checkbox"/>	CSS <input type="checkbox"/>
GMR <input checked="" type="checkbox"/>	GEX <input checked="" type="checkbox"/>	DCL <input type="checkbox"/>	DLF <input type="checkbox"/>	DPP <input type="checkbox"/>	DIA <input type="checkbox"/>	BIS <input type="checkbox"/>	
GOR <input checked="" type="checkbox"/>	TGR <input type="checkbox"/>	DCP <input type="checkbox"/>	DLT <input type="checkbox"/>	DSI <input type="checkbox"/>	DPS <input type="checkbox"/>	BCE <input type="checkbox"/>	
GPT <input checked="" type="checkbox"/>	TMR <input type="checkbox"/>	DFR <input type="checkbox"/>	DMC <input type="checkbox"/>	DTR <input type="checkbox"/>	DOP <input type="checkbox"/>	BDT <input type="checkbox"/>	
GRR <input checked="" type="checkbox"/>	TOR <input type="checkbox"/>	DGS <input type="checkbox"/>	DMR <input type="checkbox"/>	DTT <input type="checkbox"/>	DMI <input type="checkbox"/>	CAS <input type="checkbox"/>	

Comments TSP Evaluated, All Containers were properly labeled, dated & sealed.

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION Add ☒ Change Delete Link to Above Evaluation? (Y/N)

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		GPT	II	ER	262.34(a)(2) & (4)
Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Actual
010897		wm	PAJRC	021097	012397

Comments All Violations observed on 1/8/97 had been corrected.

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name American Motor Co. ID Number PA050942291 Date 1/23/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
✓				Hazardous waste determination, performed on all waste streams	262.11	H001
✓				Identification number	262.12	H002
✓				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
✓				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
✓				PA manifest used for intrastate shipments	262.20(b)	H005
✓				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
✓				Manifests filled out properly and completely	262.20(g)	H007
✓				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
✓				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
✓				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
✓				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
✓				Placards offered to transporter	262.33	H012
✓				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
✓				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
✓				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
✓				a). All containers of haz. waste in good condition	265.171	H016
✓				b). Containers compatible with hazardous waste being stored within	265.172	H017
✓				c). Containers of hazardous waste kept closed	265.173(a)	H018
✓				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
✓				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
✓				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
✓				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
✓				h). Proper containment and collection system(s)	265.178	H023
✓				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
✓				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Records retained at designated location for ³ 20 years	262.40(a)	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarterly reports submitted to the Department	262.41(a)	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262.42	H028
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste disposal plan, if required	262.45	H029
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262.46(a)	H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262.50, .53, .55, .60	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available	262.80	H033



Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable					3-Not Determined					4-Non-Compliance				
Status				REQUIREMENT												Citation			
1	2	3	4													40 CFR Part 268			
				Generators															
✓				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)			
✓				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)			
✓				Dilution not used as a substitute for treatment.												3			
✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.												7(a)(5), (a)(6)			
				Storage Facilities															
X				Facility verifies generators classification of waste in accordance with waste analysis plan.												25 Pa Code 265.13(c)			
X				Containers marked to identify contents and accumulation date.												50(a)(2)			
X				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)			
X				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)			
X				Facility maintains records of documents produced pursuant to LDR requirements.												7(a)(6)			
				Treatment Facilities, Including PBR and RRR Facilities															
X				Dilution not used as a substitute for treatment.												3			
X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.												7(b)			
X				Certification and/or notification sent with shipments of waste.												7(b)(4), (b)(5), (b)(6)			
				Land Disposal Facilities															
X				Facility tests wastes received to assure compliance with applicable treatment standards.												7(c)(2)			
X				Facility land disposes of restricted waste only if it meets applicable treatment standard.												40			
X				Facility retains copies of generator notifications and certifications.												7(c)(1)			

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1/23/97 Identification Number PADO50942291
Company/Facility/Site Name American Meter Company

1. The inspection was conducted with Mr. Gaylord Magoon, Environmental Specialist. Only those items marked in Non-Compliance on the 1/8/97 inspection report were looked at during this inspection.

2. At the time of the inspection, there were eight (8) drums located within the waste storage area. All the containers within the storage area were properly labeled, dated and sealed. The drum noted in item #6 of the 1/8/97 report, was properly labeled at the time of this inspection.

3. Please continue to manage all containers of RCRA wastes as specified in the Pa. Hazardous Waste Regulations. A copy of the regulations was provided during the inspection.

If there are any questions concerning this report or any waste related issue, please contact me at (814) 332-6829.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Gaylord Magoon Date 1-23-97
Inspector (signature) [Signature] Date 1/23/97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 1/8/97 Time start 1:30 Time finish 3:45
Name of Inspector John Crow
Company, installation name American Meter Company
Location 920 Payne Ave Erie PA 16512
County Erie Municipality Erie
Identification number PADO50942291
Name of responsible official Mr. Gaylord Magoon
Title Environmental Specialist
Mailing Address 920 Payne Ave Erie PA 16512
Area code and telephone number (814) 456-7553 now 451-8200
Name of person interviewed Mr. Gaylord Magoon
Title Environmental Specialist
Mailing address (if different from above) Same as Above
Area code and telephone number " "

1. Current waste handling method:

- | | | | | | |
|----|--|-------------------------------------|-----------------------------------|--|---|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. ~ 1,000 kg./mo. Based on 1995 and 1996 manifests.
b. ~ 12,010 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F003	Enesco Inc.	American Oil Rd
F005		EL Dorado AR 71730
D001	Safety-Kleen Corp.	1606 Pittsburgh Ave.
D039		Erie, PA 16505

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name American Meter Co. ID Number PADO50942291 Date 1/8/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>				Hazardous waste determination, performed on all waste streams	262.11	H001
<input checked="" type="checkbox"/>				Identification number	262.12	H002
<input checked="" type="checkbox"/>				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
<input checked="" type="checkbox"/>				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
<input checked="" type="checkbox"/>				PA manifest used for intrastate shipments	262.20(b)	H005
<input checked="" type="checkbox"/>				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
<input checked="" type="checkbox"/>				Manifests filled out properly and completely	262.20(g)	H007
<input checked="" type="checkbox"/>				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
<input checked="" type="checkbox"/>				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
<input checked="" type="checkbox"/>				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		<input checked="" type="checkbox"/>		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
<input checked="" type="checkbox"/>				Placards offered to transporter	262.33	H012
<input checked="" type="checkbox"/>				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
			<input checked="" type="checkbox"/>	Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J <i>See Comments # 5 + 6</i>	262.34(a)(2)	H014
		<input checked="" type="checkbox"/>		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
<input checked="" type="checkbox"/>				a). All containers of haz. waste in good condition	265.171	H016
<input checked="" type="checkbox"/>				b). Containers compatible with hazardous waste being stored within	265.172	H017
<input checked="" type="checkbox"/>				c). Containers of hazardous waste kept closed	265.173(a)	H018
<input checked="" type="checkbox"/>				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		<input checked="" type="checkbox"/>		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
<input checked="" type="checkbox"/>				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
<input checked="" type="checkbox"/>				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
<input checked="" type="checkbox"/>				h). Proper containment and collection system(s)	265.178	H023
			<input checked="" type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
<input checked="" type="checkbox"/>				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
✓				Records retained at designated location for 20 years	262.40(a)	H026
	✓			Quarterly reports submitted to the Department	262.41(a)	H027
✓				Exception reporting procedures followed	262.42	H028
	✓			Hazardous waste disposal plan, if required	262.45	H029
✓				Spill reporting procedures followed	262.46(a)	H030
		✓		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 <i>See Comment #3</i>	262.46(e)	H031
	✓			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
✓				Source reduction strategy prepared and available	262.80	H033

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
✓					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
✓					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
✓					Dilution not used as a substitute for treatment.	3	
✓					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
					Storage Facilities		
	X				Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
	X				Containers marked to identify contents and accumulation date.	50(a)(2)	
	X				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
	X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
	X				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
	X				Treatment Facilities, Including PBR and RRR Facilities		
	X				Dilution not used as a substitute for treatment.	3	
	X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
	X				Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
	X				Land Disposal Facilities		
	X				Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
	X				Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
	X				Facility retains copies of generator notifications and certifications.	7(c)(1)	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1 / 8 / 97 Identification Number PAD050942291Company/Facility Name American Meter Company

1. The inspection was conducted with Mr. Gaylord Magoon, Environmental Specialist. American Meter Company manufactures natural gas measuring instruments and meters. The principal hazardous wastes generated on site are paint filters, solvents and spent parts washer solutions.
2. 1993-1996 waste manifests were reviewed during the inspection. According to the waste disposal records, American Meter has reduced the volume of RCRA waste generated on site from 34,746 pounds in 1994 to 19,585 pounds in 1996. American Meter should be commended for its waste reduction efforts. The Department encourages American Meter to continue to reduce the volume and toxicity of the waste generated on site. It should be noted that this facility no longer conducts permit-by-rule operations.
3. The Preparedness, Prevention and Contingency (PPC) Plan currently on file with the department is dated 4/22/88. An updated plan is now being developed in accordance with the NRT Integrated Contingency Plan Guidance document. Please ensure that the facility's new phone number (814 451-8200) is used when completing the revised plan. When Completed, a copy of the new plan should be submitted to the DEP's Meadville office.
4. The employee training records indicated that the most recent training had been conducted in November of 1995. Training has been scheduled for the spring of 1997. Please be advised that section 265.16(e) of the Hazardous Waste Regulations requires an annual training review for employees handling RCRA wastes.

This inspection is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left the person.

Person interviewed (signature) _____ Date _____

Inspector (signature)  _____ Date 1 / 10 / 97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1 / 8 / 97 Identification Number PAD050942291Company/Facility Name American Meter Company

5. Three drums were located within the facility's waste storage area at the time of the inspection. Two drums of (F003/F005) paint filters were properly labeled, dated and sealed. The third container was a black, sealed drum of liquid with no labeling or accumulation date. The contents of the drum were not determined during the inspection. As previously discussed, please identify the contents of this drum as soon as possible and contact this office as to its nature. If the material is determined to be used paint solvent, a hazardous waste sticker with an accumulation date should be affixed to the drum immediately. American Meter should review its waste/ material handling procedures and take steps to ensure all drums on site are clearly labeled and all RCRA wastes are properly stored. The waste storage area does have adequate spill containment capacity.

6. An unlabeled, partially filled drum of waste paint thinner was located within the facility. The drum of waste was not marked with an accumulation date. The failure to have the drum marked with a hazardous waste sticker and an accumulation date is a violation of sections 262.34(a)(2) and 262.34(a)(4) of the Hazardous Waste Regulations. Please ensure that all drums of RCRA waste are marked with a hazardous waste sticker and accumulation date when waste is first placed in the container.

If there are any questions concerning this report or any waste related issue., please contact me at (814) 332-6829.

This inspection is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left the person.

Person interviewed (signature) _____ Date _____

Inspector (signature)  Date 1 / 10 / 97

Media

____ NPDES
____ TSCA
____ XX RCRA
____ AIR

OTHER _____

FY'89 REGION III ESD
INSPECTION TRACKING SYSTEM

Facility Name: American Meter Co.

Type of Inspection (CEI, CSI): CEI

Address: Erie, PA.

Date of Inspection: 2/21/90

Date of Reports: 3/14/90

Permit/ID Number: PAD050942291

Inspector and Office: James L. Bailey
(Wheeling)

CHECK APPLICABLE

____ Major
____ Municipal
____ Federal

____ Minor
____ Industrial
____ Violations
(Describe in
Comments Section)

____ Other

COMMENTS:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Wheeling Office
303 Methodist Bldg., 11th & Chapline Streets
Wheeling, West Virginia 26003

SUBJECT: RCRA Inspection Report - American Meter Co.
RCRA Permit - PAD050942291

DATE 3/14/90

FROM: James L. Bailey (3ES12) *JLB*
Environmental Scientist, Wheeling Operations Section

TO: Ken Anderson (3ES00)
Special Assistant, Environmental Services Division

THRU: Scott McPhilliamy (3ES12)
Environmental Scientist, Wheeling Operations Section *Scott McPhilliamy*

Attached you will find a copy of the RCRA CEI Inspection report for your review on the above subject facility. Please see that a copy of this report is forwarded to the appropriate State agency.

Should you have any questions regarding the attached, please feel free to contact this office at (304) 233-1271.

Attachments: RCRA CEI Inspection Report w/attachments

RCRA COMPLIANCE EVALUATION INSPECTION
AMERICAN METER CO.
PAD050942291
FEBRUARY 21, 1990

A RCRA CEI was conducted at American Meter Company located in Erie, PA. on February 21, 1990. Personnel participating in or contacted during this inspection included the following:

US EPA	- James L. Bailey Environmental Scientist Wheeling Operations Section
	- Vernon Butler Enforcement Engineer Region III
PA DER	- John R. Crow Solid Waste Specialist Meadville Office
American Meter	- Mark Beskid Assistant Personnel Director
	- Robert E. Axe Personnel Manager

American Meter, formerly known as Singer-American Meter Co., manufactures industrial sized gas measuring meters. The facility maintains generator status under RCRA.

Raw materials used by American Meter include aluminum alloy castings, brass, paint, uncured rubber, and solvents used to degrease component parts and as paint thinner.

The manufacturing process consists of machining, cleaning, painting, and assembly. Solvents are used in a vapor degreaser to clean the parts prior to painting. The fumes are vented to the atmosphere and recoverable solvent is reclaimed. Paint is applied in a water bath spray booth. The water is reused for a period of time and discharged to the Municipal Collection System. This discharge is subject to the NPDES pretreatment program restrictions in the form of effluent limitations. Hazardous waste generated by American Meter include:

- D001 - Waste paint
- F002 - Degreaser sludge from solvent recovery
- F003 - A one-time shipment of one drum containing alcohol. The waste was manifested out in 1988.

D009 - Mercury. Waste paint (solids and water), can also be mercury solids similar to lab parts. This waste is generated during the manufacture of thermal couples. Approximately one drum per year is generated.

F005 - Waste paint (liquids and solids) containing xylene and toluene. Also, solids buildup by paint overspray in the paint booth are manifested out as F005.

The hazardous waste drum accumulation area was inspected and the following discrepancies were documented:

1. The drum accumulation area is inspected every two weeks instead of the required weekly inspections.
2. One drum of F005, spent paint thinner was open.

Hazardous waste generated on a routine basis and subject to the Land Disposal Restrictions include F001, F002, and F005. The F003 was a one-time shipment that occurred in 1988.

American Meter personnel are aware of the LDR requirements and an appropriate form is attached to the manifest as required. The basic information included on each LDR form include the hazardous waste number, corresponding treatment standards and the manifest number.

Summary of Findings:

1. The owner or operator must inspect areas where containers are stored at least weekly. Failure to do so is a violation of 40 CFR 262.34 and 265.174.
2. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. Failure to do so is a violation of 40 CFR 262.34 and 265.173.

Hazardous Waste Inspection Report
Generators - Part A

EPA

Gen file

Date of inspection 12-14-89 Time start 11:00 Time finish 1:10
 Name of inspector John R. Crow
 Company, installation name Singer - American Meter Company
 Location 920 Payne Ave, Erie PA 16512
 County Erie Municipality Erie
 Identification number PAD050942291
 Name of responsible official Mr. Robert E. Axe
 Title Personnel Manager
 Mailing address P.O. Box 1251, 920 Payne Ave, Erie, PA 16512
 Area code and telephone number (814) 456-7553
 Name of person interviewed Mr. Vince Valerio Robert Axe
 Title _____
 Mailing address (if different from above) above
 Area code and telephone number above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 745 kg./mo. Based on first three quarters of 1989
 b. ~ 8,920 kg./yr. as marked on Quarterly Reports

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F002		
F005	Ensco Inc	Americas Oil Road
F001		EL Dorado AR 71730
D009	Chemical Waste Mgt. Inc	Ala. Highway 17 at mile
	Emelle facility	marker 163, Emelle Ala
		35459

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
	✓			PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
✓				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		✓		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		✓		Placards offered to transporter		(f)(2)
		✓		Wastes accumulated on-site for less than 90 days		(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✗	Containers managed in accordance with 75.265(q)(1)–(9) SEE NOTE #5		(g)(1)(iii)
			✗	Containers clearly marked with accumulation date and visible for inspection SEE NOTE #5		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
✓				Quarterly reports submitted to the Department		(i)
	✓			Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented SEE NOTE #4		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
✓				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Erie Municipality Erie

1. Facility inspection conducted with Mr. Vince Valerio. Presently the plant generates mercury contaminated materials, wastes associated with painting operations and solvent sludge from stills.
2. Modified painting operations incorporating new machinery will be put into use probably the beginning of 1990. This should reduce the largest waste stream (Solid Waste Paint) by as much as 65%.
3. Facility has removed 800 gal degreaser on 2nd floor and the underground storage tank.
4. The P.P.C Plan should be updated with the Meadville office's new phone number (814) 332-6848. The estimated closure cost should be recalculated to reflect current disposal costs.
5. One 55-gallon drum of F005 waste in the first floor degreaser room did not have an accumulation date and was not sealed. Four drums of solid waste paint were located in the hazardous waste

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) J. R. G. Date 12-20-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Erie Municipality Erie

storage building, two were approximately half full and were missing accumulation dates. One drum each of waste paint thinner and mercury contaminated solids was present in the storage area, these drums did have stickers, dates and were sealed. American Meter should consider reviewing its house keeping practices to ensure that all containers of hazardous waste are sealed except for adding or removing waste and that accumulation dates are indicated on drums.

6. Manifests and Quarterly Reports were inspected for 1988 and 1989, they appeared complete and accurate. All appropriate Land Disposal Restriction Notification forms were present except for the next to last Shipment manifest number AR392017 dated 08-11-89. A copy of the land-ban form should be obtained from Ensco Inc. and one copy mailed to this office.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) [Signature] Date 12-20-89

Inspector: John R Crow
Address: 101 WATER ST
MEADVILLE PA 16335
Telephone No: 814 332-6848

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Singer American Meter Company B. Street (or other identifier) P.O. Box 1251 920 PAYNE AVE
C. City Erie D. State PA E. Zip Code 16512 F. County Name ERIE
G. Nature of Business; Identification of Operations: SIC Code(s) MANUFACTURE NATURAL GAS METERS
H. EPA ID # PAD050942291
I. Handler Contact (Name and Phone Number) Mr. Robert E. Axe Personnel Manager 814 456-7553

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) P001, P003, P004, or P005 ☒ Yes ☐ No
(ii) P003 ☐ Yes ☐ No

If an P003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?
☐ Yes ☐ No

b. Sources of the above: Form 8700-12 ☒; Part A ☐; Part B ☐; Biennial/Annual Reports ☒
other (specify) _____

Solvent Sludge from still
& PAINT related wastes

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: American Meter Co.
ID Number: PA0050742291
Inspector: JOHN CRD
Date: 12-14-89

Comments

If "no" is answered to both parts of this question, a violation is indicated. (§268.7(a))

Describe the nature of the records:

- f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

FOO1
FOO2
FOO5

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

NONE

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? Yes ✓ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed N/A [§268.8(a)(2)]? Yes ✓ No

- e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? Yes ✓ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? Yes ✓ No

✓ A potential violation is indicated

Handler Name: American Meter Co.
ID Number: PA0050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☐ Yes ☐ No

- (1) List wastes for which "applied knowledge" was used:

b. TCLP ☐ Yes ☐ No

- (1) List wastes for which "TCLP" was used:

- (11) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☐ No

- d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

Handler Name: American Meter Co.
ID Number: 8A050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

Identify offsite treatment facilities

Enso Inc - Americas oil Road El Dorado AR 71730 Fo- F001, F002, F005 waste =
Chemical Waste Mgt. Inc. Emelle facility Ala. Highway 17 at mile marker 163, Emelle Ala 35459 For
D009 waste

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No*
- (ii) Corresponding treatment standard? ☐ Yes ☐ No*
- (iii) Manifest number ☐ Yes ☐ No*
- (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No*

Identify land disposal facilities receiving the BDAT certified wastes

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
- (iii) All applicable prohibitions? ☐ Yes ☐ No*
- (iv) The manifest number? ☐ Yes ☐ No*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No*

Handler Name: American Meter Co.
ID Number: PAD050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? Yes No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? Yes No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? Yes No*

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, waste-water treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ✓ Yes No

If yes, list type of treatment unit and processes
Still is used on-site for 1-1-1 Trichloroethane Solvent

If yes, TSD checklist must be completed.

Hazardous Waste Inspection Report
Generators - Part AGen CPH
★

Date of inspection 12-14-89 Time start 11:00 Time finish 1:10
 Name of inspector John R. Crow
 Company, installation name Singer - American Meter Company
 Location 920 Payne Ave, Erie PA 16512
 County Erie Municipality Erie
 Identification number PAD050942291
 Name of responsible official Mr Robert E. Axe
 Title Personnel Manager
 Mailing address P.O. Box 1251, 920 Payne Ave, Erie, PA 16512
 Area code and telephone number (814) 456-7553
 Name of person interviewed Mr. Vince Valerio Robert Axe
 Title _____
 Mailing address (if different from above) above
 Area code and telephone number above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 745 kg./mo. Based on first three quarters of 1989
 b. ~ 8,920 kg./yr. as noted on Quarterly Reports

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
FOO 2		
FOO 5	EnSCO Inc	Americas Oil Road
FOO 1		EL Dorado, AR 71730
DOO 9	Chemical Waste Mgt. Inc	Ala. Highway 17 at mile
	Emelle facility	Marker 163, Emelle, Ala
		35459

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
	✓			PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
✓				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		✓		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		✓		Placards offered to transporter		(f)(2)
		✓		Wastes accumulated on-site for less than 90 days		(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✗	Containers managed in accordance with 75.265(q)(1)–(9) SEE NOTE #5		(g)(1)(iii)
			✗	Containers clearly marked with accumulation date and visible for inspection SEE NOTE #5		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
✓				Quarterly reports submitted to the Department		(i)
	✓			Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented SEE NOTE #4		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
✓				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Erie Municipality Erie

1. Facility inspection conducted with Mr. Vince Valerio.
Presently the plant generates mercury contaminated materials, wastes associated with painting operations and solvent sludge from stills.
2. Modified painting operations incorporating new machinery will be put into use probably the beginning of 1990.
This should reduce the largest waste stream (Solid Waste Paint) by as much as 65%.
3. Facility has removed 800 gal degreaser on 2nd floor and the underground storage tank.
4. The P.P.C Plan should be updated with the Meadville office's new phone number (814) 332-6848. The estimated closure cost should be recalculated to reflect current disposal costs.
5. One 55-gallon drum of F005 waste in the first floor degreaser room did not have an accumulation date and was not sealed. Four drums of solid waste paint were located in the hazardous waste

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 12-20-89
Inspector (signature) [Signature] Date 12-20-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Eric Municipality Eric

storage building, two were approximately half full and were missing accumulation dates. One drum each of waste paint thinner and mercury contaminated solids was present in the storage area, these drums did have stickers dates and were sealed. American Meter should consider reviewing its house keeping practices to ensure that all containers of hazardous waste are sealed except for adding or removing waste and that accumulation dates are indicated on drums.

6. Manifests and Quarterly Reports were inspected for 1988 and 1989, they appeared complete and accurate. All appropriate Land Disposal Restriction Notification forms were present except for the next to last shipment, manifest number AR392017 dated 08-11-89. A copy of the land-ban form should be obtained from Enseo Inc. and one copy mailed to this office.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) [Signature] Date 12-20-89

Inspector: John R Crow
Address: 106 WATER ST
MEADVILLE PA 16335
Telephone No: 814 332-6848

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Singer American Meter Company B. Street (or other identifier) P.O. Box 1251 920 PAYNE AVE
C. City ERIC D. State PA E. Zip Code 16512 F. County Name ERIE
G. Nature of Business; Identification of Operations: SIC Code(s) MANUFACTURE NATURAL GAS METERS
H. EPA ID # PADO50942291
I. Handler Contact (Name and Phone Number) Mr. Robert E. Axe Personnel Manager 814 456-7553

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F003 ☒ Yes ☐ No
(ii) F003 ☐ Yes ☐ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?
☐ Yes ☐ No

b. Sources of the above: Form 8700-12 ☒; Part A ☒
; Part B ☐; Biennial/Annual Reports ☒
other (specify) _____

Solvent Sludge from still
& PAINT related wastes

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: American Water Co.
ID Number: PA0050742291
Inspector: JOHN CRD
Date: 12-14-89

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

FOO1
FOO2
FOO5

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

NONE

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ____ Yes ☒ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ____ Yes ☒ No

- e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ____ Yes ☒ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ____ Yes ____ No

2/ A potential violation is indicated

Handler Name: American Meter Co.
ID Number: PA0050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☐ Yes ☐ No

- (1) List wastes for which "applied knowledge" was used:

b. TCLP ☐ Yes ☐ No

- (1) List wastes for which "TCLP" was used:

- (11) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☐ No

- d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

Handler Name: American Water Co.
ID Number: PA050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

Identify offsite treatment facilities

Enso Inc - Americas oil Road El Dorado AR 71730 F001, F002, F003 waste
Chemical Waste Mgt. Inc. Emelle facility Ala. Highway 17 at mile marker 163 Emelle Ala 35459 F0

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No*
- (ii) Corresponding treatment standard? ☐ Yes ☐ No*
- (iii) Manifest number ☐ Yes ☐ No*
- (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No*

Identify land disposal facilities receiving the BDAT certified wastes

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
- (iii) All applicable prohibitions? ☐ Yes ☐ No*
- (iv) The manifest number? ☐ Yes ☐ No*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No*

Handler Name: American Meter Co.
ID Number: PADOS0942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? Yes No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? Yes No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? Yes No*

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, waste-water treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ✓ Yes No

If yes, list type of treatment unit and processes
Still is used on-site for 1-1-1 Trichloroethane Solvent

If yes, TSD checklist must be completed.

Gen

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 12-14-89 Time start 11:00 Time finish 1:10
 Name of inspector John R. Crow
 Company, installation name Singer - American Meter Company
 Location 920 Payne Ave, Erie PA 16512
 County Erie Municipality Erie
 Identification number PAD050942291
 Name of responsible official Mr. Robert E. Axe
 Title Personnel Manager
 Mailing address P.O. Box 1251, 920 Payne Ave, Erie, PA 16512
 Area code and telephone number (814) 456-7553
 Name of person interviewed Mr. Vince Valerio Robert Axe
 Title _____
 Mailing address (if different from above) above
 Area code and telephone number above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 745 kg./mo. Based on first three quarters of 1989
 b. ~ 8,920 kg./yr. as marked on Quarterly Reports

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F002		
F005	Enesco Inc	Americas Oil Road
F001		EL Dorado AR 71730
D009	Chemical Waste Mgt. Inc	Ala. Highway 17 at mile
	Emelle facility	marker 163, Emelle Ala
		35459

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
	✓			PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
✓				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		✓		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		✓		Placards offered to transporter		(f)(2)
		✓		Wastes accumulated on-site for less than 90 days		(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✗	Containers managed in accordance with 75.265(q)(1)–(9) SEE NOTE #5		(g)(1)(iii)
			✗	Containers clearly marked with accumulation date and visible for inspection SEE NOTE #5		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
✓				Quarterly reports submitted to the Department		(i)
	✓			Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented SEE NOTE #4		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
✓				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Erie Municipality Erie

1. Facility inspection conducted with Mr. Vince Valerio. Presently, the plant generates mercury contaminated materials, wastes associated with painting operations and solvent sludge from stills.
2. Modified painting operations incorporating new machinery will be put into use probably the beginning of 1990. This should reduce the largest waste stream (Solid Waste Paint) by as much as 65%.
3. Facility has removed 800 gal degreaser on 2nd floor and the underground storage tank.
4. The P.P.C Plan should be updated with the Meadville office's new phone number (814) 332-6848. The estimated closure cost should be recalculated to reflect current disposal costs.
5. One 55-gallon drum of F005 waste in the first floor degreaser room did not have an accumulation date and was not sealed. Four drums of solid waste paint were located in the hazardous waste

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 12-20-89
Inspector (signature) [Signature] Date 12-20-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Eric Municipality Eric

Storage building, two were approximately half full and were missing accumulation dates. One drum each of waste paint thinner and mercury contaminated solids was present in the storage area, these drums did have stickers, dates and were sealed. American Meter should consider reviewing its house keeping practices to ensure that all containers of hazardous waste are sealed except for adding or removing waste and that accumulation dates are indicated on drums.

6. Manifests and Quarterly Reports were inspected for 1988 and 1989, they appeared complete and accurate. All appropriate Land Disposal Restriction Notification forms were present except for the next to last shipment, manifest number AR392017 dated 08-11-89. A copy of the land-ban form should be obtained from Ensco Inc. and one copy mailed to this office.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) [Signature] Date 12-20-89

Inspector: John R Crow
Address: 101 WATER ST
MEADVILLE PA 16335
Telephone No: 814 332-6848

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Singer American Meter Company B. Street (or other identifier) P.O. Box 1251 920 PAYNE AVE
C. City Erie D. State PA E. Zip Code 16512 F. County Name ERIE
G. Nature of Business; Identification of Operations: SIC Code(s) MANUFACTURE NATURAL GAS METERS
H. EPA ID # PAD050942291
I. Handler Contact (Name and Phone Number) Mr. Robert E. Axe Personnel Manager 814 456-7553

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) P001, P002, P004, or P005 ☒ Yes ☐ No
(ii) P003 ☐ Yes ☐ No

If an P003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?
☐ Yes ☐ No

b. Sources of the above: Form 8700-12 ☒; Part A ☐; Part B ☐; Biennial/Annual Reports ☒
other (specify) _____

Solvent Sludge from still
& PAINT related wastes

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: American Motor Co
ID Number: PA0050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix B for listing. List First Third Wastes handled by the generator here:

FOO1
FOO2
FOO5

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

NONE

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? Yes /No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed NA [§268.8(a)(2)]? Yes No*

- e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? Yes /No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? Yes No*

2/ A potential violation is indicated

Handler Name: American Meter Co.

ID Number: PA0050942291

Inspector: JOHN CROW

Date: 12-14-89

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☐ Yes ☐ No

- (i) List wastes for which "applied knowledge" was used:

b. TCLP ☐ Yes ☐ No

- (i) List wastes for which "TCLP" was used:

- (ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☐ No

- d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

Handler Name: American Meter Co.
ID Number: PA050942291
Inspector: JOHN CROW
Date: 6-14-89

Comments

Identify offsite treatment facilities

Enveco Inc - Americas oil Road El Dorado AR 71730 F001, F002, F003 waste
Chemical Waste Mgt. Inc. Emelle facility Ala. Highway 17 at mile marker 163, Emelle Ala 35459 For
D009 waste

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No*
- (ii) Corresponding treatment standard? ☐ Yes ☐ No*
- (iii) Manifest number ☐ Yes ☐ No*
- (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No*

Identify land disposal facilities receiving the BDAT certified wastes

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
- (iii) All applicable prohibitions? ☐ Yes ☐ No*
- (iv) The manifest number? ☐ Yes ☐ No*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No*

Handler Name: American Meter Co.
ID Number: PADOS0942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? Yes No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? Yes No
- If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? Yes No*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, waste-water treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ✓ Yes No
- If yes, list type of treatment unit and processes
Still is used on-site for 1-1-1 Trichloroethane Solvent

If yes, TSDF checklist must be completed.

1990 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

EPA ID: PAD050942291

HANDLER NAME: SINGER American Meter Company

ADDRESS: 920 Payne Ave, Erie PA 16512

4. Date Entry

New ☒
Updated ☐

DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 12/14/89

So. AGENCY RESPONSIBLE FOR EVALUATION: S
Put code in box

E = EPA
S = State
C = Contractor/EPA
O = Other
B = Contractor/State
X = Oversight

TYPE OF EVALUATION COVERED BY THIS REPORT:

Select Evaluation type and insert in box: I

1 = Compliance Eval. Inspection (CEI) 4 = Comp O&M Eval (OME)
2 = Sampling Inspection 5 = Compliance Sched. Eval
3 = Record Review 11 = Case Dev. Inspection
12 = O&M Inspection
13 = CA Oversight Insp.

DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 3): 1/1/

Evi. Comments: Plant Produces Natural Gas meters, Generators Fuel/2/5 and D009 wastes.

CLASS and VIOLATIONS

Key:

X = Violations, no specialties
B = Violations & Specialty
S = Same Viol./Specialty
Z = Pending determination
O = No Viol or Specialty found

Class of Violation	Violations							
	GMI	C/PC	Pin. Reg.	PL, B	Imp. Sch.	Manifest	Lead-Benl	Other
I								
II							X	X
Acceptable Codes								
	X	X	X	X	X	X	X	X
	S	S	S	S	S	S	S	S
	Z	Z	Z	Z	Z	Z	Z	Z
	O	O	O	O	O	O	O	O
	N	N	1*	N	C	N	N	N
			0*		B			
			N		N			

Specialties

1 = No Insurance only
C = CA Schedule Violation
N = NDV

1 = only

Viol. Comments: manifest no# AR397017 did not have lead-ben notification
Drums did not have Accumulation dates, one drum was open.

ENFORCEMENT ACTIONS:

Class	Area of Viol./rel.	Type (use code)	Date Action Taken		Compliance Dates		Penalty		Resp. Ag. (use code)
			Scheduled	Actual	Scheduled	Actual	Assessed	Collected	
II	LB	10	12-24-89	1-15-90					S
II	OT	10	12-20-89	1-15-90					S

Codes for: 03 = Warning Letter 11 = Piled Civil Action 15 = CA Init. Admin Order Regd. Agcy Codes
Types of: 04 = Admin. Complaint 12 = Piled Criminal Action 16 = CA Final Admin Order E = EPA
Enforcement: 05 = Final Admin. Order 18 = Civil Referral to AG/DOJ 21 = Notice of Non-comp. S = State
Actions: 10 = Informal 19 = Final Judicial Order 22 = PPCA X = EPA Oversight
23 = Fed. Proc. Referral to HQ

10. Enforce. Comments: Will check to see Accumulation dates or worked.
Company is to mail State a copy of missing lead-ben notification.

Hazardous Waste Inspection Report
Generators - Part A

B CPH

Date of inspection 12-14-89 Time start 11:00 Time finish 1:10
 Name of inspector John R. Crow
 Company, installation name Singer - American Meter Company
 Location 920 Payne Ave, Erie PA 16512
 County Erie Municipality Erie
 Identification number PAD050942291
 Name of responsible official Mr. Robert E. Axe
 Title Personnel Manager
 Mailing address P.O. Box 1251, 920 Payne Ave, Erie, PA 16512
 Area code and telephone number (814) 456-7553
 Name of person interviewed Mr. Vince Valerio Robert Axe
 Title _____
 Mailing address (if different from above) above
 Area code and telephone number above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 745 kg./mo. Based on first three quarters of 1989
 b. ~ 8,920 kg./yr. as marked on Quarterly Reports

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F002		
F005	EnSCO Inc	Americas Oil Road
F001		EL Dorado AR 71730
D009	Chemical Waste Mgt. Inc	Ala. Highway 17 at mile
	Emelle facility	marker 163, Emelle Ala
		35459

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
	✓			PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
✓				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		✓		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		✓		Placards offered to transporter		(f)(2)
		✓		Wastes accumulated on-site for less than 90 days		(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✗	Containers managed in accordance with 75.265(q)(1)–(9) SEE NOTE #5		(g)(1)(iii)
			✗	Containers clearly marked with accumulation date and visible for inspection SEE NOTE #5		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
✓				Quarterly reports submitted to the Department		(i)
	✓			Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented SEE NOTE #4		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
✓				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PA050942291
Company, Installation Name Singer - American Meter Company
County Erie Municipality Erie

1. Facility inspection conducted with Mr. Vince Valerio. Presently the plant generates mercury contaminated materials, wastes associated with painting operations and solvent sludge from stills.
2. Modified painting operations incorporating new machinery will be put into use probably the beginning of 1990. This should reduce the largest waste stream (Solid Waste Paint) by as much as 65%.
3. Facility has removed 800 gal degreaser on 2nd floor and the underground storage tank.
4. The P.P.C Plan should be updated with the Meadville office's new phone number (814) 332-6848. The estimated closure cost should be recalculated to reflect current disposal costs.
5. One 55-gallon drum of F005 waste in the first floor degreaser room did not have an accumulation date and was not sealed. Four drums of solid waste paint were located in the hazardous waste

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Person Interviewed (signature) [Signature] Date 12-20-89
Inspector (signature) [Signature] Date 12-20-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO50942291
Company, Installation Name Singer - American Meter Company
County Eric Municipality Eric

Storage building, two were approximately half full and were missing accumulation dates. One drum each of waste paint thinner and mercury contaminated solids was present in the storage area, these drums did have stickers dates and were sealed. American Meter should consider reviewing its house keeping practices to ensure that all containers of hazardous waste are sealed except for adding or removing waste and that accumulation dates are indicated on drums.

6. Manifests and Quarterly Reports were inspected for 1988 and 1989, they appeared complete and accurate. All appropriate Land Disposal Restriction Notification forms were present except for the next to last shipment, manifest number AR392017 dated 08-11-89. A copy of the land-ban form should be obtained from Ensco Inc. and one copy mailed to this office.

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Person Interviewed (signature) _____ Date _____
Inspector (signature) [Signature] Date 12-20-89

Inspector: John R Crow
Address: 101 WATER ST
MEADVILLE PA 16335
Telephone No: 814 332-6848

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Singer American Meter Company B. Street (or other identifier) P.O. Box 1251 920 PAYNE AVE
C. City Erie D. State PA E. Zip Code 16512 F. County Name ERIE
G. Nature of Business; Identification of Operations; SIC Code(s) MANUFACTURE NATURAL GAS METERS
H. EPA ID # PAD050942291
I. Handler Contact (Name and Phone Number) Mr. Robert E. Axe Personnel Manager 814 456-7553

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F003, F004, or F005 ☒ Yes ☐ No

(ii) F003 ☐ Yes ☐ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

b. Sources of the above: Form 8700-12 ☒; Part A ☐; Part B ☐; Biennial/Annual Reports ☒ other (specify) ☐

Solvent Sludge from still
+ PAINT related wastes

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: American Meter Co.
ID Number: PA0050942291
Inspector: JOHN CRDW
Date: 12-14-89

Comments

If "no" is answered to both parts of this question, a violation is indicated. (§268.7(a))

Describe the nature of the records:

- f. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

EQ01
EQ02
EQ05

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

NONE

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? Yes ✓ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? NA Yes ✓ No

- e. Source of the above: Form 8700-12 ____; Part A ____; Part B ____; Biennial/Annual Report ____; other (specify) ____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? Yes ✓ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? Yes ✓ No

2/ A potential violation is indicated

Handler Name: American Meter Co.
ID Number: PA0050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☐ Yes ☐ No

- (1) List wastes for which "applied knowledge" was used:

b. TCLP ☐ Yes ☐ No

- (1) List wastes for which "TCLP" was used:

- (11) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☐ No

- d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

Handler Name: American Meter Co.
ID Number: PA050942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

Identify offsite treatment facilities

Enseo Inc - Americas oil Road El Dorado AR 71730 F001, F002, F005 waste

- Chemical Waste Mgt. Inc. Emelle facility Ala. Highway 17 at mile marker 163, Emelle Ala 35459 For
b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including: D009 waste

- (i) EPA hazardous waste I.D. number? Yes No*
(ii) Corresponding treatment standard? Yes No*
(iii) Manifest number Yes No*
(iii) Certification regarding waste and that it meets treatment standards? Yes No*

Identify land disposal facilities receiving the BDAT certified wastes

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? Yes No*
(ii) Corresponding Treatment Standards? Yes No*
(iii) All applicable prohibitions? Yes No*
(iv) The manifest number? Yes No*
(v) The date the wastes are subject to prohibitions? Yes No*
(vi) Does generator keep records of all notifications/certifications sent to offsite facilities? Yes No*

Handler Name: American Meter Co.
ID Number: PADOS0942291
Inspector: JOHN CROW
Date: 12-14-89

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? Yes No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? Yes No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? Yes No*

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, waste-water treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ✓ Yes No

If yes, list type of treatment unit and processes
Still is used on-site for 1-1-1 Trichloroethene Solvent

If yes, TSD checklist must be completed.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection - *SINGER-AMERICAN METER DIV.*
PAD 05 094 2291

DATE: *JAN. 14, 1988*

FROM: William L. Walsh, EPS
PA RCRA Enforcement Section (3HW11) *WLV*

TO: File

THRU: *JOSEPH KOTLINSKI, ACTING CHIEF* *JAK*
~~Peter W. Schaul, Chief~~
PA RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF
THESE VIOLATIONS.

htr

HAZARDOUS WASTE INSPECTION REPORT
Generator - Part A

EPA

#1 of 5

Date of inspection 12-4-87 Time start 10-05 Time finish 1:25
Name of inspector Richard E. Strawn
Company, installation name Singer - American Meter Div.
Location 920 Payne Ave., Erie
County Erie Municipality Erie
Identification number PAD 050942291
Name of responsible official Mr. David D. Jackson
Title Manager, Manufacturing Engineer
Mailing address P.O. Box 1251, 920 Payne Ave., Erie, PA 16512
Area code and phone no. 814-456-7553
Name of person interviewed David Jackson, Vince Valerio
Title _____
Mailing address (if different from above) above
Area code and phone no. above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment ☐ storage, ☐ disposal
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 625 kg./mo. Based upon first Three Quarters
b. _____ kg./yr. of 1987 as recorded on Quarterly
Reports,

3. Types of hazardous waste produced by Hazardous Waste Number:

F001, F002, F005, D009

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part

#2 of 5

1 - NON COMPLIANCE, 2 - COMPLIANCE, 3 - NOT APPLICABLE, 4 - NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	
1	2	3	4		
	✓			Identification number	(c)
	✓			Hazardous waste shipments offered only to licensed transporters	(c) (1)
	✓			Authorization received from TSD facility for wastes shipped off-site	(d)
		✓		PA manifest used for intrastate shipments	(c) (1)
	✓			Disposer state manifest or PA manifest used for out-of-state shipments	(c) (2)
✗				Manifests filled out properly and completely	(c) (7)
	✓			Manifests routed properly and within time limits (24 hours)	(e)
	✓			Proper U.S. DOT shipping containers or packages	(f) (1)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f) (1) (1)
✗				Containers of 100 gal. or less marked with required PA label	(f) (1) (1)
		✓		Placards offered to transporter	(f) (2)
✗				Wastes accumulated on-site for less than 90 days	(g) (1)
✗				Wastes stored in proper containers and properly marked and labeled	(g) (1) (1)
	✓			Containers managed in accordance with 75.265(q) (1-9)	(g) (1) (1)
✗				Containers clearly marked with accumulation date and visible for inspection	(g) (1) (1)
	✓			Records retained at designated location for 20 years.	(h)
	✓			Quarterly reports submitted to the Department	(i)
	✓			Exception reporting procedures followed	(j)
	✓			Hazardous waste disposal plan, if required	(1)
		✓		Spill reporting procedures followed	(m) (1)
	✓			Preparedness, Prevention and Contingency Plan implemented implemented	(m) (5)
		✓		Special requirements followed for international shipments	(o)
	✓			ON THE JOB OR CLASSROOM PERSONNEL TRAINING PROGRAM AS PER 75.265 (F).	g(1)(v)

Date of inspection 12-4-87 Identification number PAD 050942291
Company, Installation name Singer American Meter Div.
County Erie Municipality Erie

1. I requested that an updated Notification form be submitted noting the addition of F005 and any other pertinent information or changes. A Supplemental Form should also be submitted indicating that this facility is operating a still/reclaimer as an integral part of its degreasers. These forms along with a copy of the Department's Hazardous Waste Regulations were given to Mr. Jackson at the time of the inspection.
2. This facility has a PPC Plan, however it has never been formally approved by the Dept. and is in need of being completely revised. A copy of the Department's Guidelines for the Development and Implementation of Preparedness, Prevention, and Contingency (PPC) Plans were given to Mr. Jackson during the inspection. A new PPC Plan should be developed in accordance with the Department's guidelines by Feb 15, 1988 and submitted to the Department for approval.

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Person Interviewed (signature) _____ Date _____
Inspector (signature) Richard E. Strawn Date 12-8-87

Date of inspection 12-4-87 Identification number PAD 050942291
Company, Installation name Singer - American Meter Div.
County Erie Municipality Erie

3. The hazardous waste storage area is not acceptable. An open drain is located within a few feet of the stored waste and there is no containment structure such as a dike or a berm. This area should be identified as containing ~~or~~ containing hazardous waste. The storage area should be upgraded or relocated to an appropriate area and fully addressed in the PPC Plan.
4. A full description of the degreasing unit which contains as an integral part a reclaimers should also be addressed in the PPC Plan.
5. An empty container was labeled with a hazardous waste label and dated 5-18-87. When hazardous waste has been removed from a container, the label should also be removed.
6. One container of waste paint sludge (FO05) was not labeled or identified as hazardous waste.
7. One container of waste mercury solids (DO09) was

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Person Interviewed (signature) _____ Date _____
Inspector (signature) Richard E. Strawn Date 12-10-87

Date of inspection 12-4-87 Identification number PAB 050942291
Company, Installation name Singer - American Meter Div.
County Erie Municipality Erie

dated 3-9-87 and had exceeded the ninety day storage requirements.

8. One container of F005 waste and one container of F002 waste did not contain accumulation dates. These two containers were in the storage area.

One container of waste mercury solids (D009) located at the point of generation did not contain an accumulation date.

9. Manifest # PAB 00558865 dated 11-6-85 did not list the transporter's phone number.

10. In a telephone conversation with Mr. Jackson on 12-14-87 I requested that a method be utilized to determine the amounts of solvents which are being reclaimed. These amounts should be reported on the Quarterly Reports. Mr. Jackson said that since the still is a batch operation a close estimate of the volumes reclaimed can be obtained and will be reported.

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Person Interviewed (signature) _____ Date _____

Inspector (signature)

Richard E. Strawn

Date

12-10-87

12-14-87